

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY JOHNSON,)	JURY TRIAL DEMANDED
)	
Plaintiff)	No. 15 CV 07177
)	
vs.)	Hon. Gary Feinerman
)	
BRIAN LUTZOW, <i>et al.</i> ,)	Magistrate Judge Susan E. Cox
)	
Defendants.)	

JOINT MOTION FOR DISMISSAL WITH PREJUDICE

NOW COMES the Plaintiff, ANTHONY JOHNSON (“Plaintiff”) by and through his attorneys Stephen L. Richards and Joshua S.M. Richards, and Defendants BRIAN LUTZOW, ROBERT GARZA, JAMES LAS COLA, CHESTER BACH, DAVID EVANS, and EDWARD WINSTEAD, (“Defendants”) by and through their attorneys, James G. Sotos, Joseph M. Polick, Jeffrey N. Given, and Daniel J. McGinnis, and jointly move this Court to dismiss this matter with prejudice, and in support state:

1. The parties reached a settlement of this case on August 27, 2021.
2. The settlement agreement was fully executed by the parties on September 2, 2021.
3. All provisions of the Release and Settlement Agreement required to be completed before the case could be dismissed with prejudice have been met to the satisfaction of the parties.
4. The parties have filed a Stipulation to Dismiss. Dkt. 149.
5. The parties now file this motion to dismiss the case with prejudice and attach a draft Final Agreed Order (Exhibit A).

WHEREFORE, the parties request this Court dismiss this case with prejudice and without leave to reinstate and with each party bearing its own costs and attorneys’ fees.

Date: November 19, 2021

Respectfully Submitted,

ANTHONY JOHNSON

Plaintiff,

/s/ Stephen L. Richards

By: Stephen L. Richards

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One of the Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2021, I electronically filed the foregoing **Joint Motion for Dismissal with Prejudice** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed on the below Service List:

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